

EXHIBIT 24

11/03/2005 11:31 8185041180

SANITEC

PAGE 01/02

**CONSENT OF MAJORITY SHAREHOLDER OF
SANITEC WORLDWIDE, LTD. IN LIEU OF MEETING**

The undersigned, being the majority shareholder of Sanitec Worldwide, Ltd., a Delaware corporation ("the Company"), hereby consents to the following in lieu of a meeting of the shareholders of the Company.

WHEREAS, a court of competent jurisdiction has determined that James Harkess owns the entire right, title and interest to Windsor Holdings LLC, a California limited liability company;

WHEREAS, Windsor Holdings LLC owns a majority of the shares of the Company;

WHEREAS, there are no validly elected members of the Board of Directors of the Company and such positions are vacant;

WHEREAS, the majority shareholder of the Company desires to elect Directors to fill the vacant positions;

NOW THEREFORE BE IT RESOLVED, the following persons are hereby elected as Directors of the Company for a one year term, effective July 12, 2005:

James Harkess
Russell Firestone
Nord Sorensen

The foregoing action is taken by the shareholder of the Company holding outstanding stock having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares entitled to vote thereon were present by written consent without a meeting pursuant to 8 Del. C. §§ 211, 228.

IN WITNESS WHEREOF, this written consent has been executed as of July 12, 2005.

WINDSOR HOLDINGS LLC
A California limited liability corporation

By 

James Harkess

Its Sole and Managing Member

#3979048

EXHIBIT 25

11/03/2005 11:31 8185041180

SANITEC

PAGE 02/02

**CONSENT OF SHARHOLDER OF
SANITEC, LTD. IN LIEU OF MEETING**

The undersigned, being the sole shareholder of Sanitec, Ltd., a Delaware corporation ("the Company"), hereby consents to the following in lieu of a meeting of the shareholders of the Company.

WHEREAS, there are no validly elected members of the Board of Directors of the Company and such positions are vacant;

WHEREAS, the sole shareholder of the Company desires to elect Directors to fill the vacant positions;

NOW THEREFORE BE IT RESOLVED, the following persons are hereby elected as Directors of the Company for a one year term, effective July 12, 2005:

James Harkess
Russell Firestone
Nord Sorensen

The foregoing action is taken by the shareholder of the Company holding outstanding stock having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares entitled to vote thereon were present by written consent without a meeting pursuant to 8 Del. C. §§ 211, 228.

IN WITNESS WHEREOF, this written consent has been executed as of July 12, 2005.

SANITEC WORLDWIDE, LTD.,
A Delaware company

By 

James Harkess
Chairman of the Board and President

EXHIBIT 26

**UNANIMOUS WRITTEN CONSENT OF THE
BOARD OF DIRECTORS OF SANITEC WORLDWIDE, LTD.
IN LIEU OF MEETING**

The undersigned, being the Board of Directors of Sanitec Worldwide, Ltd., a Delaware corporation ("the Company"), hereby unanimously adopt the following resolutions in lieu of a meeting:

Appointment of Officers

RESOLVED, that the following are hereby appointed as officers of the Company, effective July 12, 2005:

James Harkess Chairman of the Board of Directors and President

Russell Firestone Vice President and Secretary

Nord Sorenson Vice President

General Authority

RESOLVED, that the officers of the Company be, and hereby are, authorized and directed to take any such action as may be deemed necessary and advisable in order to carry out the purpose and intent of the foregoing resolution and to carry on the business of the Company.

RESOLVED, that Jeffrey Weinstein, James H. Smith, and persons acting on their behalf have no connection with and not authorized to act on behalf of the Company.

Ratification of Appointment of Counsel

RESOLVED, that the following counsel have been and are engaged and authorized to represent the Company, effective as of October 29, 2003:

Patton Boggs LLP

McDonald Hopkins Co., LPA

The Bayard Firm

Knott & Glazier LLP

Weston Benshoof et al.

RESOLVED, that no other counsel is authorized to represent the Company in any pending litigation.

RESOLVED, that James Harkess is authorized to direct the actions of counsel for the Company in any litigation in which the Company is or may become a party.

The foregoing actions are taken by the Board of Directors of the Company by unanimous written consent without a meeting pursuant to 8 Del. C. § 141(f).

Oct 26 05 12:52p

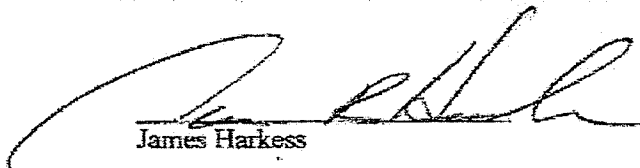
Nord S. Sorense

909-769-9506


P. 4

The foregoing actions are taken by the Board of Directors of the Company by unanimous written consent without a meeting pursuant to 8 Del. C. § 141(f).

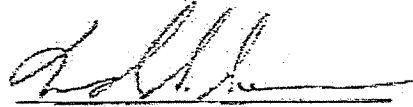
IN WITNESS WHEREOF, this written consent has been executed as of July 12, 2005.



James Harkess



Russell Firestone



Nord Sorenson

23879032

EXHIBIT 27

**UNANIMOUS WRITTEN CONSENT OF THE
BOARD OF DIRECTORS OF SANITEC, LTD.
IN LIEU OF MEETING**

The undersigned, being the Board of Directors of Sanitec, Ltd., a Delaware corporation ("the Company"), hereby unanimously adopt the following resolutions in lieu of a meeting:

Appointment of Officers

RESOLVED, that the following are hereby appointed as officers of the Company, effective July 12, 2005:

James Harkess	Chairman of the Board of Directors and President
Russell Firestone	Vice President and Secretary
Nord Sorenson	Vice President

General Authority

RESOLVED, that the officers of the Company be, and hereby are, authorized and directed to take any such action as may be deemed necessary and advisable in order to carry out the purpose and intent of the foregoing resolution and to carry on the business of the Company.

RESOLVED, that Jeffrey Weinstein, James H. Smith, and persons acting on their behalf have no connection with and not authorized to act on behalf of the Company.

Ratification of Appointment of Counsel

RESOLVED, that the following counsel have been and are engaged to represent the Company:

Patton Boggs LLP
McDonald Hopkins Co., LPA
Weston Benshoof et al.

RESOLVED, that no other counsel is authorized to represent the Company in any pending litigation.

RESOLVED, that James Harkess is authorized to direct the actions of counsel for the Company in any litigation in which the Company is or may become a party.

RESOLVED, that the Company's counsel is hereby instructed to oppose any attempt to re-open the case captioned *Sanitec West v. Delloiacovo*, Civil Action No. 1:02-CV-01582 (N.D. Ohio) and to seek a final dismissal with prejudice of that action.

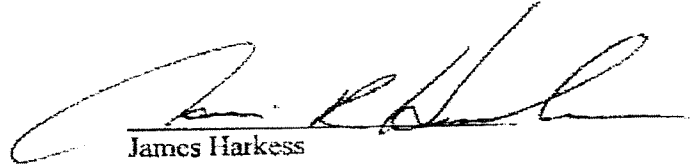
Oct 26 05 12:52p

Nord S. Sorensen

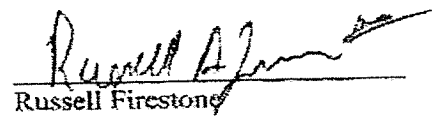
909-769-9506

p.2

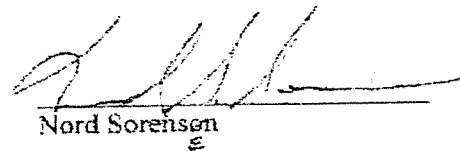
IN WITNESS WHEREOF, this written consent has been executed as of July 12, 2005.



James Harkess



Russell Firestone



Nord Sorensen
E

#3879118

EXHIBIT 28



2550 M Street, NW
Washington, DC 20037-1350
202-457-6000

Facsimile 202-457-6315
www.pattonboggs.com

November 30, 2005

Richard J. Oparil
(202) 457-6496
roparil@pattonboggs.com

By FedEx

David L. Finger, Esq.
Finger & Slanina, LLC
One Commerce Center
1201 Orange Street, Suite 725
Wilmington, DE 19801-1155

Re: *Sanitec Industries, Inc. v. Sanitec Worldwide, Ltd., et al.*

Dear Mr. Finger:

As you know, there have been allegations regarding the true ownership of defendant, Sanitec Worldwide, Ltd. ("Worldwide"), and Sanitec, Ltd.

It was undisputed that Windsor Holdings, LLC ("Windsor") owned 51% of Worldwide, which in turn owned all of the shares of Sanitec, Ltd. Thus, whoever owned and controlled Windsor indirectly owned and controlled Worldwide and Sanitec, Ltd. Patton Boggs has been taking its direction from James Harkess ("Harkess"), who asserted that he owned Windsor. Jeffrey Weinsten ("Weinsten"), a convicted felon, and James Smith ("Smith"), asserted that they, as trustees of a purported Windsor Trust, owned Windsor. Your firm, apparently taking direction from Weinsten and Smith, filed an appearance in this action as counsel for Worldwide as well as Weinsten and Smith individually.

Harkess initiated an action in Superior Court of Los Angeles County, California, captioned *Harkess v. Quinn, et al.*, No. 311681, seeking a declaration that he owned and controlled Windsor, and thus Worldwide and Sanitec, Ltd. A bench trial was held in the Spring of this year. On October 18, 2005, the Court entered final judgment declaring that Mr. Harkess – and not Messrs. Weinsten, Smith, Quinn, or the purported Windsor Trust – owns and controls Windsor. The Court also enjoined Weinsten, Smith, Quinn, and persons acting in concert with them from representing or claiming that they have any ownership interest in Windsor or its assets, specifically Worldwide and Sanitec, Ltd. (Ex. 1). Moreover, as a result of a settlement agreement (Ex. 2), the judgment is final.



David L. Finger, Esq.
November 30, 2005
Page 2

Accordingly, the dispute about who owns Worldwide and Sanitec, Ltd. is over. Messrs. Weinstein, Smith, Quinn, and others acting in concert with them have been enjoined from asserting any ownership interest in Windsor and Windsor's assets, including Sanitec, Ltd. and Worldwide. Your firm is not authorized to represent Worldwide in this action. Attached is a copy of a written consent of Worldwide's Board of Directors confirming these facts. (Ex. 3). Please immediately file a motion to withdraw from representing Worldwide in this action.

Thank you for your prompt attention.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Richard J. Oparil', written over the typed name.

Richard J. Oparil

Enclosures

cc: Richard D. Kirk, Esq.

EXHIBIT 29

PATTON BOGGS^{LLP}
ATTORNEYS AT LAW

2550 M Street, NW
Washington, DC 20037-1350
202-457-6000

Facsimile 202-457-5315
www.pattonboggs.com

December 1, 2005

Jennifer L. King
(202) 457-6506
jking@pattonboggs.com

By Fax

David L. Finger, Esq.
Finger & Slanina, LLC
One Commerce Center
1201 Orange Street, Suite 725
Wilmington, DE 19801-1155

Re: *Sanitec Industries, Inc. v Sanitec Worldwide, Ltd., et al.*

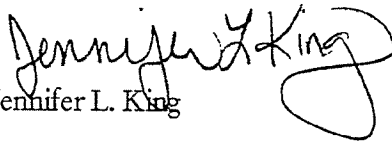
Dear Mr. Finger:

In Sanitec Worldwide, Ltd.'s October 5, 2005 Response To Plaintiff's First Request For The Production Of Documents And Things, Worldwide indicated that it would produce non-privileged responsive documents. Worldwide has not yet produced any documents.

Moreover, Worldwide has not produced initial disclosures according to Fed. R. Civ. P. 26(a)(1) and D. Del. LR 16.2, although they were due August 5, 2005. (*See* Rule 16 Scheduling Order, Doc. No. 32).

Please let us know when we may expect to receive documents and initial disclosures.

Very truly yours,


Jennifer L. King

Confirmation Report - Memory Send

Time : 12-01-05 01:30pm
Tel line : 2024576315
Name : PATTON BOGGS LLP

Job number : 923
Date : 12-01 01:29pm
To : 913029841294--0229280101
Document pages : 02
Start time : 12-01 01:29pm
End time : 12-01 01:30pm
Pages sent : 02
Status : OK

Job number : 923

*** SEND SUCCESSFUL ***



2650 M Street NW
Washington DC 20037
(202) 457-6000
Facsimile (202) 457-6316

To:	David L. Finger, Esq.
Company:	Finger & Stanina, LLC
Fax Number:	(302) 984-1294
Phone Number:	(302) 884-6766
Total Pages Including Cover:	2
From:	Jennifer L. King
Sender's Direct Line:	(202) 457-6506
Date:	December 1, 2005
Client Number:	022928.0101
Comments:	

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EXHIBIT 30

Case Summary

[Click here to access document images for this case.](#)

Case Number: BC311681

JAMES HARKESS VS TERRENCE QUINN ET AL

Filing Date: 03/05/2004

Case Type: Declaratory Relief Only (General Jurisdiction)

Status: Judgment by Court 08/18/2005

Cases Related: BC330527 on 05/26/2005

Cases Related: BC330528 on 05/26/2005

Future Hearings

03/02/2006 at 09:00 am in department 26 at 111 North Hill Street, Los Angeles, CA 90012

Status Conference (PRE HEARING FOR CONTEMPT**OFF CALENDAR**)

03/06/2006 at 08:30 am in department 26 at 111 North Hill Street, Los Angeles, CA 90012

OSC re Contempt

[Documents Filed](#) | [Proceeding Information](#)

Parties

BABOS PETER - Defendant/Respondent

DILIBERTO MICHAEL R. - Mediator

HARKESS JAMES - Plaintiff and Cross-Defendant

HARTLEY MICHAEL J. - Atty for Plaintiff and Cross-Deft

HATHAWAY MARK M. ESQ. - Former Attorney for Deft & X-Comp

LEE TERRANCE - Defendant/Respondent's AKA

LINER YANKELEVITZ SUNSHINE & REGENSTREIF - Atty for Deft and Cross-Complnt

LYMAN TERESA - Defendant/Respondent

QUATKEMEYER WINDSON TRUST - Defendant/Respondent

QUINN TERRENCE - Defendant and Cross-Complainant

SMITH JAMES H. - Defendant/Respondent

WEINSTEIN JEFFREY - Defendant/Respondent

WINDSOR TRUST - Defendant

[Case Information](#) | [Party Information](#) | [Proceeding Information](#)

[Click here to access document images for this case.](#)

Documents Filed (Filing dates listed in descending order)

Click on any of the below link(s) to see documents filed on or before the date indicated:

[07/21/2005](#) [03/18/2005](#) [09/10/2004](#)

01/27/2006 Ex-Parte Application (FOR CONTINUANCE OF CONTEMPT HEARING...)

Filed by Attorney for Respondent

01/27/2006 Ex-Parte Application (FOR AN ORDER ALLOWING TELEPHONIC VIDEO TESTIMONY OF DAN MAKEE)

Filed by Attorney for Pltf/Petr

01/27/2006 Opposition Document (TO EX PARTE APPLICATION TO CONTINUE OSC HEARING)

Filed by Attorney for Pltf/Petr

01/27/2006 Declaration (OF SCOTT J. LEIPZIG IN SUPPORT OF EX PARTE)

Filed by Attorney for Pltf/Petr

01/27/2006 Notice of Ruling

Filed by Atty for Plaintiff and Cross-Deft

01/26/2006 Substitution of Attorney

Filed by Attorney for Deft/Respnt

01/24/2006 Notice (OF WITHDRAWAL OF CONTEMPT ALLEGATIONS AGAINST TERRANCE LEE QUATKEMEYER)

Filed by Attorney for Plaintiff/Petitioner

01/23/2006 Miscellaneous-Other (contempt proceeding witness list)

Filed by Atty for Plaintiff and Cross-Deft

01/20/2006 Notice (of failure to file opposition re: contempt)

Filed by Atty for Plaintiff and Cross-Deft

01/17/2006 Declaration (of Terrance Lee Quatkemeyer)

Filed by Attorney for Deft/Respnt

12/14/2005 Notice of Ruling

Filed by Atty for Plaintiff and Cross-Deft

11/07/2005 Notice of Continuance (on appliation for OSC re contempt 12/14/05)
Filed by Atty for Plaintiff and Cross-Deft

11/02/2005 Notice of Continuance
Filed by Clerk

10/26/2005 Ex-Parte Application (APPLICATION FOR AN ORDER TO SHOW CAUSE
RE: CONTEMPT)
Filed by Attorney for Pltf/Petnr

10/26/2005 Declaration (OF LISA GILFORD RE: NOTICE OF EX PARTE)
Filed by Attorney for Pltf/Petnr

10/26/2005 Declaration (OF JAMES HARKESS IN SUPPORT OF APPLICATION FOR
AN OSC RE: CONTEMP)
Filed by Attorney for Pltf/Petnr

10/26/2005 Notice of Motion (for order to show cause re contempt)
Filed by Attorney for Pltf/Petnr

10/26/2005 Proof of Service
Filed by Attorney for Pltf/Petnr

10/26/2005 Request for Judicial Notice (FILED IN SUPPORT OF EX PARTE
APPLICATION)
Filed by Attorney for Pltf/Petnr

10/26/2005 Declaration (OF MICHAEL J. HARTLEY FILED IN SUPPORT OF EX
PARTE)
Filed by Attorney for Pltf/Petnr

10/24/2005 Notice (of entry of final judgment in favor of james harkess)
Filed by Atty for Plaintiff and Cross-Deft

10/17/2005 Stipulation (AND ORDER RE: ENTRY OF FINAL JUDGMENT)
Filed by Attorney for Pltf/Petnr

09/14/2005 Motion to Tax Costs
Filed by Attorney for Deft/Respnt

09/02/2005 Notice (of etnry of order awarding costs)
Filed by Atty for Plaintiff and Cross-Deft

08/30/2005 Order (AWARDING COSTS TO PREVAILING PARTY JAMES HARKESS
PURSUANT TO CCP 1032 AND 1034)
Filed by Attorney for Pltf/Petnr

08/25/2005 Memorandum of Costs (\$60,971.41. COSTS ENTERED 9/14/05 MEMO
TO SCAN UNIT 9/14/05 NO COURT FILE)
Filed by Atty for Plaintiff and Cross-Deft

08/22/2005 Notice (of statement of decision)
Filed by Atty for Plaintiff and Cross-Deft

08/18/2005 Statement of Decision
Filed by Court

08/18/2005 Judgment (IN FAVOR OF JAMES HARKESS)
Filed by Court

08/09/2005 Reply/Response (to objection to notice of related cases)
Filed by Atty for Plaintiff and Cross-Deft

07/26/2005 Opposition Document (and counter-proposal to objections to court
proposed statement of decision)
Filed by Atty for Plaintiff and Cross-Deft

07/26/2005 Miscellaneous-Other (verification re trial exhibits 256 and 258)
Filed by Attorney for Deft/Respnt

Click on any of the below link(s) to see documents filed on or before the date
indicated:

[TOP](#) [07/21/2005](#) [03/18/2005](#) [09/10/2004](#)

07/21/2005 Notice-Related Cases (with case number BC322202)
Filed by Atty for Plaintiff and Cross-Deft

07/21/2005 Objection (DEFTS OBJECTIONS TO COURTS PROPOSED STATEMENT
OF DECISION AND PROPOSALS)
Filed by Attorney for Deft/Respnt

07/21/2005 Objection (TO COURT PROPOSED STATEMENT OF DECISION AND
PROPOSALS)
Filed by Attorney for Deft/Respnt

07/12/2005 Notice (of tentative ruling and proposed statement of decision)
Filed by Atty for Plaintiff and Cross-Deft

07/11/2005 Miscellaneous-Other (TENTATIVE RULING AND PROPOSED
STATEMENT OF DECISION)
Filed by Clerk

06/21/2005 Notice of Ruling
Filed by Atty for Plaintiff and Cross-Deft

06/15/2005 Order (RE: MOTION FOR AN ORDER REQUIRING THAT
DEFENDANT/CORSS-COMPLAINANT RETURN INADVERTENTLY PRODUCED
PRIVILEGED DOCUMENTS)
Filed by Attorney for Pltff/Petnr

06/06/2005 Notice (of failure to file opposition)
Filed by Attorney for Pltff/Petnr

06/01/2005 Notice (of court order re related cases)
Filed by Atty for Plaintiff and Cross-Deft

04/27/2005 Notice-Related Cases (with case no. bc330528 and BC330527)

Filed by Atty for Plaintiff and Cross-Deft

04/21/2005 Declaration (of michael j. hartley)
Filed by Atty for Plaintiff and Cross-Deft

04/21/2005 Motion for an Order (return advertently produced privileged documents)
Filed by Atty for Plaintiff and Cross-Deft

04/21/2005 Brief (closing trial brief)
Filed by Atty for Plaintiff and Cross-Deft

04/21/2005 Miscellaneous-Other (timeline)
Filed by Atty for Plaintiff and Cross-Deft

04/21/2005 Brief (post trial)
Filed by Attorney for Deft/Respnt

04/19/2005 Stipulation and Order (re: closing trial briefs)
Filed by Atty for Plaintiff and Cross-Deft

04/05/2005 Objection Document (to request for judicial notice)
Filed by Attorney for Deft/Respnt

04/04/2005 Proof of Service (re: personal service of amended request for judicial notice)
Filed by Atty for Plaintiff and Cross-Deft

04/04/2005 Request for Judicial Notice (amended)
Filed by Atty for Plaintiff and Cross-Deft

04/04/2005 List of Witnesses (updated joint)
Filed by Atty for Plaintiff and Cross-Deft

04/01/2005 Miscellaneous-Other (amended designation of transcript of Donald Sallee)
Filed by Atty for Plaintiff and Cross-Deft

04/01/2005 Miscellaneous-Other (amended designation of transcript of Mike Ward)
Filed by Atty for Plaintiff and Cross-Deft

03/29/2005 Notice (of errata)
Filed by Atty for Plaintiff and Cross-Deft

03/29/2005 Proof of Service
Filed by Atty for Plaintiff and Cross-Deft

03/28/2005 Amended List of Exhibits
Filed by Attorney for Deft/Respnt

03/28/2005 Notice of Lodging (DEPOSITIONS)
Filed by Attorney for Pltff/Petrnr

03/28/2005 List of Exhibits
Filed by Attorney for Pltff/Petrnr

03/28/2005 List of Witnesses
Filed by Attorney for Pltff/Petrnr

03/25/2005 Ex-Parte Application (FOR ORDER ALLOWING TELEPHONIC
TESTIMONY OF MARK RICHARDSON;)
Filed by Attorney for Pltff/Petrnr

03/25/2005 Brief (trial)
Filed by Attorney for Deft/Respnt

03/25/2005 Brief (trial)
Filed by Atty for Plaintiff and Cross-Deft

03/25/2005 Declaration (of personal prf of svc of trial brief)
Filed by Atty for Plaintiff and Cross-Deft

03/25/2005 Declaration (OF SCOTT SEIPZIG)
Filed by Attorney for Pltff/Petrnr

03/25/2005 Notice of Lodging
Filed by Atty for Plaintiff and Cross-Deft

03/24/2005 Notice (of withdrawal of designation of transcript of Barbara L.
Sager)
Filed by Atty for Plaintiff and Cross-Deft

03/23/2005 Motion in Limine
Filed by Attorney for Deft/Respnt

03/22/2005 List of Exhibits
Filed by Atty for Plaintiff and Cross-Deft

03/22/2005 List of Witnesses
Filed by Atty for Plaintiff and Cross-Deft

03/22/2005 List of Witnesses
Filed by Attorney for Deft/Respnt

03/22/2005 List of Exhibits
Filed by Attorney for Deft/Respnt

03/21/2005 Reply/Response (brief in support of motion in limine)
Filed by Atty for Plaintiff and Cross-Deft

03/21/2005 Notice (of withdrawal of plttfs motion in limine to exclude evidence)
Filed by Atty for Plaintiff and Cross-Deft

03/21/2005 Notice (of entry of stipulation and order re continuance of final status
conf. by one day to 3/23/05)
Filed by Atty for Plaintiff and Cross-Deft

Click on any of the below link(s) to see documents filed on or before the date indicated:

TOP 07/21/2005 03/18/2005 09/10/2004

03/18/2005 Stipulation and Order (re: continuance of final status conf. by one day to 3/23/05)
Filed by Atty for Plaintiff and Cross-Deft

03/18/2005 Opposition Document (to motion to exclude attorney Peter Babos from courtroom aT trial)
Filed by Attorney for Deft/Respnt

03/18/2005 Miscellaneous-Other (designation of transcript of Mike Ward)
Filed by Atty for Plaintiff and Cross-Deft

03/18/2005 Miscellaneous-Other (designation of transcript of Donald Sallee)
Filed by Atty for Plaintiff and Cross-Deft

03/18/2005 Miscellaneous-Other (designation of the transcript of Barbara L. Sager)
Filed by Atty for Plaintiff and Cross-Deft

03/15/2005 Ex-Parte Application (FOR SHORT CONTINUANCE OF TRIAL)
Filed by Attorney for Deft/Respnt

03/15/2005 Motion to Compel (NOTICE TO COMPEL ATTENDANCE OF CROSS-COMPLAINANT JEFFREY J. WEINSTEN AT TRIAL)
Filed by Atty for Plaintiff and Cross-Deft

03/15/2005 Motion to Compel (NOTICE TO COMPEL ATTENDANCE OF CROSS-COMPLAINANT JAMES H. SMITH AT TRIAL)
Filed by Atty for Plaintiff and Cross-Deft

03/15/2005 Motion to Compel (NOTICE TO COMPEL ATTENDANCE OF DEFT & X-COMPL. TERENCE QUINN AKA TERRANCE LEE QUATKEMEYER AT TRIAL)
Filed by Atty for Plaintiff and Cross-Deft

03/14/2005 Notice of Ruling
Filed by Atty for Plaintiff and Cross-Deft

03/14/2005 Proof of Service
Filed by Atty for Plaintiff and Cross-Deft

03/14/2005 Ex-Parte Application (for an order to shorten time for notice and hearing on motion in limine)
Filed by Attorney for Pltf/Petr

03/14/2005 Order (granting ex parte application)
Filed by Attorney for Pltf/Petr

03/14/2005 Motion in Limine
Filed by Atty for Plaintiff and Cross-Deft

03/09/2005 Stipulation and Order (re deposition of Terrance Quinn OSC re failure to attend depositio)
Filed by Atty for Plaintiff and Cross-Deft

02/07/2005 Answer to Second Amended Complaint
Filed by Attorney for Deft/Respnt

01/05/2005 Proof of Service
Filed by Atty for Plaintiff and Cross-Deft

01/05/2005 Notice of Ruling
Filed by Atty for Plaintiff and Cross-Deft

01/05/2005 Second Amended Complaint
Filed by Atty for Plaintiff and Cross-Deft

01/04/2005 Order (GRANTING MOTION TO CONTINUE TRIAL DATE AND FOR PROTECTIVE ORDER;)
Filed by Attorney for Plaintiff/Petitioner

01/04/2005 Miscellaneous-Other (CIVIL DEPOSIT; TRIAL CONTINUANCE FEE;)
Filed by Attorney for Plaintiff/Petitioner

12/30/2004 Reply/Response (brief in support of motion to continue trial)
Filed by Atty for Plaintiff and Cross-Deft

12/30/2004 Reply/Response (breif in support of motion for leave)
Filed by Atty for Plaintiff and Cross-Deft

12/30/2004 Reply/Response (to memorandum of P & A's in opposition to motion to comple)
Filed by Attorney for Deft/Respnt

12/28/2004 Opposition Points & Authorities (motion to compel)
Filed by Atty for Plaintiff and Cross-Deft

12/28/2004 Opposition Document (to motion to file third amended complaint)
Filed by Attorney for Deft/Respnt

12/28/2004 Opposition Document (to motion to continucance of trial and protective order)
Filed by Attorney for Deft/Respnt

12/21/2004 Ex-parte Request for Order
Filed by Attorney for Deft/Respnt

12/21/2004 Proof of Service (re: personal service)
Filed by Atty for Plaintiff and Cross-Deft

12/21/2004 Notice of Motion (to amend complaint)
Filed by Atty for Plaintiff and Cross-Deft

12/21/2004 Declaration (in support of ex parte)

Filed by Plaintiff and Cross-Defendant

12/21/2004 Ex-parte Request for Order
Filed by Attorney for Pltff/Petrnr

12/21/2004 Notice of Motion (to continue trial date)
Filed by Atty for Plaintiff and Cross-Deft

12/21/2004 Declaration (of Michael J. Hartley)
Filed by Atty for Plaintiff and Cross-Deft

11/18/2004 Notice of Ruling
Filed by Atty for Plaintiff and Cross-Deft

11/03/2004 Notice of Ruling
Filed by Atty for Plaintiff and Cross-Deft

10/27/2004 Notice of Ruling
Filed by Atty for Plaintiff and Cross-Deft

10/22/2004 Statement-Non-Agreement
Filed by Mediator

10/20/2004 Opposition Document (TO MOTION TO COMPEL PRODUCTION OF
DOCUMENTS AND ADEQUATE INTERROGATORY RESPONSES)
Filed by Attorney for Deft/Respnt

10/05/2004 Motion to Compel
Filed by Atty for Plaintiff and Cross-Deft

10/05/2004 Proof of Service (re: personal service)
Filed by Atty for Plaintiff and Cross-Deft

10/05/2004 Declaration (of Michael J. Hartley)
Filed by Atty for Plaintiff and Cross-Deft

09/27/2004 Objection Document (to ntc of related cases bc 315338)
Filed by Attorney for Pltff/Petrnr

09/24/2004 Notice-Related Cases (with case no. BC315338)
Filed by Attorney for Deft/Respnt

09/16/2004 Notice (OF ORDER DENYING MOTION TO DIS- QUALIFY COUNSEL)
Filed by Attorney for Defendant/Respondent

09/14/2004 Declaration (of Terrance Quinn and Mark M. Hathaway, Esq)
Filed by Attorney for Deft/Respnt

09/14/2004 Objection Document (to declaration of Terrance Quinn and Mark M.
Hathawar, Esq)
Filed by Attorney for Pltff/Petrnr

Click on any of the below link(s) to see documents filed on or before the date

indicated:

TOP 07/21/2005 03/18/2005 09/10/2004

09/10/2004 Objection Document (to evidence proffered in motion to disqualify)
Filed by Attorney for Deft/Respnt

09/07/2004 Opposition Document (to motion to disqualify counsel for deft
Quinn)
Filed by Attorney for Deft/Respnt

08/20/2004 Answer to Cross-Complaint
Filed by Atty for Plaintiff and Cross-Deft

08/06/2004 Notice (of unavailable)
Filed by Attorney for Deft/Respnt

08/05/2004 Notice of Continuance (motion to disqualify counsel)
Filed by Attorney for Pltf/Petrnr

08/03/2004 Notice of Motion (to disqualify counsel for deft Quinn)
Filed by Attorney for Pltf/Petrnr

08/03/2004 Declaration (of James Harkess)
Filed by Attorney for Pltf/Petrnr

08/03/2004 Request for Judicial Notice
Filed by Attorney for Pltf/Petrnr

08/03/2004 Declaration (of Michael J. Hartley)
Filed by Attorney for Pltf/Petrnr

07/26/2004 Notice-Assignment-Mediator
Filed by ADR Clerk

07/20/2004 Cross-complaint
Filed by Atty for Deft and Cross-Complnt

07/07/2004 Statement-Case Management
Filed by Attorney for Deft/Respnt

07/06/2004 Statement-Case Management
Filed by Attorney for Pltf/Petrnr

06/18/2004 Notice (of case management conf. 7/21/04)
Filed by Attorney for Pltf/Petrnr

06/16/2004 Answer to Complaint
Filed by Attorney for Deft/Respnt

05/18/2004 Notice-Case Management Conference
Filed by Clerk

05/14/2004 Notice (of taking OSC failure to file prf of svc off calendar)

Filed by Attorney for Pltf/Petr

05/10/2004 Ord to Show Cause (Ntc to Appear)
Filed by Clerk

05/10/2004 Proof-Service/Summons
Filed by Attorney for Pltf/Petr

05/10/2004 Summons Filed
Filed by Attorney for Pltf/Petr

05/04/2004 Ord to Show Cause (Ntc to Appear)
Filed by Clerk

04/27/2004 First Amended Complaint (FOR DECLARATORY RELIEF;)
Filed by Attorney for Plaintiff/Petitioner

03/05/2004 Complaint

09/10/2001 Reply/Response (breif in support of motion to disqualify counsel)
Filed by Attorney for Pltf/Petr

Click on any of the below link(s) to see documents filed on or before the date indicated:

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[Case Information](#) | [Party Information](#) | [Documents Filed](#)

Proceedings Held (Proceeding dates listed in descending order)

Click on any of the below link(s) to see proceedings held on or before the date indicated:

[3/22/2005](#)

01/30/2006 at 08:30 am in Department 26, James R. Dunn, Presiding
OSC re Contempt - **Matter continued**

01/27/2006 at 08:30 am in Department 26, James R. Dunn, Presiding
Exparte proceeding - **Court makes order**

12/14/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Status Conference (RE: POSSIBLE SETTING OF OSC RECONTEMPT;*EX PARTE APPLICATION FOR CONTEMPT) - **Trial Date Set**

11/14/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Status Hearing (RE: POSSIBLE SETTING ON OSC RE:CONTEMPT) - **Not Held-Continued**

10/27/2005 at 08:35 am in Department 26, James R. Dunn, Presiding
Motion to Tax Costs - **Off Calendar**

10/26/2005 at 08:30 am in Department 26, James R. Dunn, Presiding

Exparte proceeding - **Court makes order**

10/18/2005 at 08:35 am in Department 26, James R. Dunn, Presiding
Motion to Tax Costs - **Matter continued**

08/18/2005 at 03:00 pm in Department 26, James R. Dunn, Presiding
Court Order - **Court makes order**

07/11/2005 in Department 26, James R. Dunn, Presiding
Court Order - **Completed**

06/13/2005 at 08:35 am in Department 26, James R. Dunn, Presiding
Motion for an Order - **Granted**

05/26/2005 at 03:00 pm in Department 26, James R. Dunn, Presiding
Court Order - **Court makes order**

04/15/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Court Order - **Completed**

04/07/2005 at 09:00 am in Department 26, James R. Dunn, Presiding
Court Trial - Long Cause - **Submitted**

04/06/2005 at 09:30 am in Department 26, James R. Dunn, Presiding
Court Trial - Long Cause - **Full Day of Trial Held**

04/05/2005 at 09:30 am in Department 26, James R. Dunn, Presiding
Court Trial - Long Cause - **Full Day of Trial Held**

04/04/2005 at 09:30 am in Department 26, James R. Dunn, Presiding
Court Trial - Long Cause - **Full Day of Trial Held**

03/30/2005 at 10:30 am in Department 26, James R. Dunn, Presiding
Court Trial - Long Cause - **Full Day of Trial Held**

03/30/2005 at 09:00 am in Department 26, James R. Dunn, Presiding
Non-Appearance (Case Review) - **Completed**

03/29/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Court Trial - Long Cause - **Full Day of Trial Held**

03/28/2005 at 10:00 am in Department 26, James R. Dunn, Presiding
Court Trial - Long Cause - **Full Day of Trial Held**

03/25/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Exparte proceeding - **Off Calendar**

Click on any of the below link(s) to see proceedings held on or before the date indicated:

[TOP](#) [3/22/2005](#)

03/22/2005 at 09:00 am in Department 26, James R. Dunn, Presiding
Final Status Conference - **Matter continued**

03/16/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Order to Show Cause - **Matter continued**

03/15/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Exparte proceeding - **Denied**

03/14/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Exparte proceeding - **Granted**

01/04/2005 at 08:30 am in Department 26, James R. Dunn, Presiding
Motion for an Order - **Completed**

12/21/2004 at 08:30 am in Department 42, ELIHU M. BERLE, Presiding
Exparte proceeding - **Granted**

11/10/2004 at 10:00 am in Department 26, James R. Dunn, Presiding
Non-Appearance (Case Review) - **Court makes order**

11/05/2004 at 09:00 am in Department 26, James R. Dunn, Presiding
Non-Appearance (Case Review) - **Completed**

11/01/2004 at 02:00 pm in Department 26, James R. Dunn, Presiding
Non-Appearance (Case Review) - **Completed**

10/29/2004 at 08:30 am in Department 26, James R. Dunn, Presiding
Conference-Post Mediation Status - **No appearance(s), off calendar**

10/26/2004 at 09:30 am in Department ADRO, ADR Hearing Officer, Presiding
Closed-ADR (10-18-04MICHAEL R. DILIBERTO, MEDIATOR) - **Statement-Non-Agreement**

10/26/2004 at 08:35 am in Department 26, James R. Dunn, Presiding
Motion to Compel - **Granted in Part**

10/01/2004 at 08:30 am in Department 26, James R. Dunn, Presiding
Court Order - **Completed**

09/15/2004 at 08:35 am in Department 26, James R. Dunn, Presiding
Motion Hearing (TO DISQUALIFY COUNSEL) - **Motion Denied**

09/02/2004 at 08:35 am in Department 26, James R. Dunn, Presiding
Motion Hearing (TO DISQUALIFY COUNSEL;) - **Matter continued**

07/21/2004 at 08:30 am in Department 26, James R. Dunn, Presiding
Conference-Case Management - **Proceeding continued**

06/07/2004 at 08:40 am in Department 26, James R. Dunn, Presiding
OSC - No Return of Service - **Off Calendar**

Click on any of the below link(s) to see proceedings held on or before the date indicated:

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[Case Information](#) | [Party Information](#) | [Documents Filed](#) | [Proceeding Information](#)

EXHIBIT 31

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SANITEC INDUSTRIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-1386-JJF
)	
SANITEC WORLDWIDE, LTD.,)	
)	
Defendant.)	

DECLARATION OF RICHARD J. OPARIL

Richard J. Oparil deposes and says:

1. I am a counsel for the plaintiff in this action, Sanitec Industries, Inc. ("Industries"), and a member of the District of Columbia and New York Bars. I make this declaration in connection with Industries' motion for voluntary dismissal of this action against defendant, Sanitec Worldwide, Ltd. ("Worldwide").

2. I have personal knowledge of the facts set forth herein and could competently testify if required to do so.

3. Worldwide has never provided its initial disclosures to Industries. In addition, Worldwide did not respond to Industries' requests for admission and interrogatories served by hand on November 15, 2005 (D.I. 34; Exs. 1-2). Nor did Worldwide produce any documents responsive to Industries' requests.

4. On December 1, 2005, Industries' counsel wrote to Worldwide's counsel, David L. Finger, Esq. ("Finger"), reminding him that he had not served Worldwide's initial disclosures or produced any responsive documents. (Ex. 29 to accompanying memorandum). No response to that letter was ever received.

5. James Harkess ("Harkess") is an officer and director of Industries.

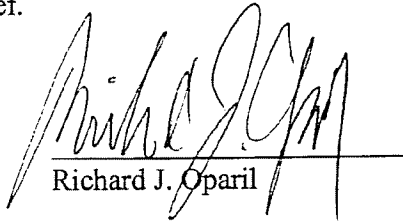
6. In other litigation involving the Sanitec technology and intellectual property, including in the U.S. District Court for the Northern District of Ohio, disputes arose in 2003 as to the true ownership of Worldwide and Sanitec, Ltd.

7. On December 14, 2005, the Superior Court of Los Angeles County, California, in *Harkess v. Quinn, et al.*, No. 311681, issued an Order to Show Cause why Jeffrey Weinstein and James Smith (former defendants in this action) should not be held in contempt for violating that Court's prior judgment enjoining them from representing that they had any interest in Windsor, Worldwide or Sanitec, Ltd. (Ex. 23). The contempt proceeding is pending.

8. On November 30, 2005, I wrote to Mr. Finger to inform him of the outcome of the above captioned California case, to provide him with copies of the relevant judicial findings and the settlement agreement in that case, and to discharge him as Worldwide's counsel and to demand that he withdraw from representing Worldwide. (Ex. 28). Mr. Finger has neither replied to the letter nor moved to withdraw.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: March 2, 2006


Richard J. Oparil

#3928560

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on March 2, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following

David L. Finger, Esq.
Finger & Slanina
One Commerce Center
1201 Orange Street, Suite 725
Wilmington, DE 19801

The undersigned further certifies that copies of the foregoing were sent to the above counsel by hand on March 2, 2006.

/s/ Richard D. Kirk (#922)